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## **HELLA STATEMENT ON COMPLIANCE WITH THE UK MODERN SLAVERY ACT 2015**



## HELLA Statement on Compliance with the UK Modern Slavery Act 2015

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The Statement on Slavery and Human Trafficking is published in accordance with the UK Modern Slavery Act 2015 for HELLA GmbH & Co. KGaA (hereinafter 'HELLA'), headquartered in Lippstadt, Germany. It covers the fiscal year from 1 June 2018 to 31 May 2019 and applies to all consolidated HELLA subsidiaries<sup>1</sup> listed in the [2018/2019 Annual Report](#), including HELLA Ltd. and HELLA UK Holdings Ltd. in the United Kingdom.

### **ABOUT HELLA**

HELLA is a global, family-owned company, listed on the stock exchange, with over 125 locations in some 35 countries. With sales of € 7.0 billion in the fiscal year 2018/2019 and 39,000 employees, HELLA is one of the leading automotive suppliers. HELLA specializes in innovative lighting systems and vehicle electronics and has been an important partner to the automotive industry and aftermarket for more than a century. Furthermore, in its Special Applications segment, HELLA develops, manufactures and sells lighting and electronic products for special vehicles.

### **OUR SUPPLY CHAIN**

The HELLA purchasing department was responsible for an annual purchasing volume of more than € 4 billion for production materials, capital goods and services in the 2018/2019 fiscal year. Production materials account for the largest share. At HELLA, we are convinced that working in partnership with our suppliers is a key factor for success. We rely on partnerships and cooperations with our suppliers to fulfil our customers' high expectations. We thus strive to build close relationships with suppliers and to incorporate them in our business processes.

HELLA maintains supplier relationships with over 1,000 strategic suppliers worldwide. This complex structure entails a certain risk that violations of human rights in the supply chain may occur. We expect our suppliers to conduct their business activities in a socially and ecologically responsible manner and to adhere to our [Code of Conduct for Suppliers and Service Providers](#). HELLA procures a significant proportion of its overall purchasing volume from major suppliers in OECD countries with standards and processes ensuring that human rights are respected.

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<sup>1</sup> Joint ventures, Avitea and Docter Optics including HELLA subsidiaries are responsible individually for managing their supply chains and personnel and are therefore not considered here.



## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to complying with global laws and regulations and to conducting business in a fair manner. All HELLA companies are subject to HELLA policies and guidelines. They include the HELLA Code of Conduct as well as the HELLA Code of Conduct for Suppliers and Service Providers, which incorporates compliance requirements in the supply chain.

### **HELLA Code of Conduct**

All HELLA employees are bound worldwide by HELLA's Code of Conduct. It serves to distinguish right from wrong behaviour and to master the legal challenges that arise in our everyday cooperation with colleagues, customers, suppliers, other business partners and third parties. It sets out, for example, provisions of labour law and social principles by which HELLA clearly rejects all forms of forced labour, including slavery and human trafficking.

### **HELLA Code of Conduct for Suppliers and Service Providers**

The HELLA Code of Conduct for Suppliers and Service Providers is intended to ensure that business activities along our value creation chain comply with international standards and conventions. This document summarizes our expectations of suppliers and service providers in terms of working conditions, occupational health and safety, business ethics and the environment.

By accepting the HELLA Code of Conduct for Suppliers and Service Providers, HELLA's strategic suppliers commit themselves to acting responsibly and adhering to the principles outlined above. We expect our suppliers to ensure that their own suppliers and service providers also observe and follow these principles.

## **DUE DILIGENCE**

We endeavour to avoid adverse effects on human rights which may be caused by business activities throughout our value creation chain.

### **SUPPLIER SUSTAINABILITY AUDITS**

HELLA verifies compliance with the HELLA Code of Conduct for Suppliers and Service Providers by means of spot checks. Information on environmental performance and sustainability is obtained through risk-based sustainability audits of selected strategic suppliers and through other measures such as self-disclosure in specific areas. For suppliers with deficits, action plans with corrective measures are drawn



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up to ensure that expectations are met within a reasonable timeframe. HELLA reserves the right to terminate relationships with suppliers in the event of persistent serious violations.

### **REPORTING TOOL**

HELLA does not tolerate any violations of the Code of Conduct. Misconduct must be reported to superiors, managing directors or Compliance & Legal Officers. Our web-based reporting system "tellUS!" is available to all HELLA employees to report possible violations of laws and other serious misconduct, anonymously if wished.

### **TRAINING AND COMMUNICATION**

To further raise awareness among employees, we rely on targeted training measures. This includes training on the Code of Conduct as well as extensive communication measures. Onboarding processes ensure that every new employee receives and confirms our Code of Conduct.

HELLA continuously adapts its company-specific regulations to changing conditions. We strive to continuously improve the transparency of our procurement processes and our measures to extend the duty of care.

Approved and signed on behalf of the Management Board

Lippstadt, 7th November 2019

A handwritten signature in black ink, appearing to read "n. Schneider".

**Dr. Nicole Schneider**

Member of the Management Board

Human Resources

HELLA GmbH & Co. KGaA